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27 GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER; MATTHEW CATE AND
28 T.A. WOOD

18
19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21 RAYMOND J. MANZANILLO,

22 Case No. 3:12-cv-05983-JST

23 Plaintiff,

24 v.
25 **STIPULATION AND [PROPOSED] ORDER**
26 **TO EXTEND DISCOVERY DEADLINES**

27 GREGORY D. LEWIS, et al.,
28 Defendants.

1 Plaintiff Raymond Manzanillo (“Plaintiff”) and Defendants N. Brown, Gregory D. Lewis, J.
2 Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (“Defendants”) (collectively “the Parties”) by and
3 through their counsel hereby stipulate as follows:

- 4 1. The Parties anticipate that there will be a number of non-expert depositions in this matter.
- 5 2. To ensure that the Parties are able to complete all of the depositions and accommodate
6 the schedules of the Parties and the witnesses, the Parties have agreed to extend all discovery deadlines
7 by thirty (30) days (or the next court day assuming the new date falls on a weekend or holiday).
- 8 3. This stipulation will not impact the deadline to file dispositive motions; the deadline to
9 file pretrial conference statements; the pretrial conference date; or the trial date.

10 4. Accordingly, the Parties stipulate that the amended case schedule shall be as follows:

- 11 a. Fact Discovery Cut-Off: April 4, 2016
12 b. Expert Disclosures: April 25, 2016
13 c. Expert Rebuttal: May 9, 2016
14 d. Expert Discovery Cut-Off: May 30, 2016
15 e. Deadline to File Dispositive Motions: June 17, 2016
16 f. Pretrial Conference Statement Due: September 13, 2016
17 g. Pretrial Conference: September 23, 2016 at 2:00 p.m.
18 h. Trial (estimated length six days) October 17, 2016 at 8:30 a.m.

19 IT IS SO STIPULATED.

20 DATED: December 16, 2015

Respectfully submitted,

21 SEYFARTH SHAW LLP

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23 By: /s/ Michael A. Wahlander
Francis J. Ortman III
Aryeh M. Hersher
Jason M. Allen
Michael A. Wahlander

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26 Attorneys for Plaintiff
27 RAYMOND J. MANZANILLO
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1 DATED: December 16, 2015

Respectfully submitted,

2 MCNAMARA LAW FIRM

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4 By: /s/ William Lee McCaslin

5 Peter Jon Hirsig
William Lee McCaslin

6 Attorneys for Defendant
7 N. BROWN

8 DATED: December 16, 2015

Respectfully submitted,

9 CALIFORNIA STATE ATTORNEY
10 GENERAL'S OFFICE

11

12 By: /s/ Michael James Quinn

Michael James Quinn

13 Attorneys for Defendants
14 GREGORY D. LEWIS; J. HALLOCK;
15 K. MCGUYER; MATTHEW CATE AND
T.A. WOOD

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17 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

18 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been
19 obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for
20 Defendants.

21 Executed this 16th day of December 2015, in San Francisco, CA.

22 /s/ Michael A. Wahlander

23 Michael A. Wahlander

1 **[PROPOSED] ORDER**

2 Pursuant to the Parties' stipulation and good cause appearing, the Scheduling Order [ECF No.
3 168] is amended to reflect the dates set forth in the Parties' stipulation.

4 IT IS SO ORDERED.

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6 Dated: December 16, 2015
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